

FILED

JAN 06 2004

CAPITOL SQUARE
COURTHOUSE
GREENVILLE, SC 29601

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

Fred K. Waechter, Jr., Eliot Gould,)
Walter E. Thomas, Stacey T. Peppers,)
Judy Wertz, Rosa M. Glover,)
Sherryl R. Brown, Charles L. Hughes,)
Robert C. Vaughn, Sheila Langley,)
Billy F. Willis, Jr., Pam Collins,)
Sherry Livingston, Yvonne Canfield and)
Barbara A. Roman, and Jane P. Snodgrass,)
as Personal Representative of the Estate)
of Stephen Snodgrass,)

Plaintiffs,)

vs.)

Advanced Manufacturing Components, Inc.,)
Milton Moore, Employer Service Group,)
LLC, B. Scott Glidewell, and Mid-South)
Benefits Group,)

Defendants.)

C/A No: 8:02-3397-26

**DEFENDANT B. SCOTT GLIDEWELL
AND MID-SOUTH BENEFITS
GROUP'S ANSWERS TO
RULE 26.01 INTERROGATORIES**

TO: ROBERT E. HOSKINS, ATTORNEY FOR THE PLAINTIFFS ABOVE-NAMED:

A. State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: None.

B. As to each claim, state whether it should be tried jury or non-jury and why.

ANSWER: Non-jury.

C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares

or other indicia of ownership of the party; (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER: Defendants are not publically owned companies.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER: This division is proper.

E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: Patricia Kinney, Brenda McCall, Bob Drinkard and R. Watson Goldman v. Employer Service Group, LLC and Employer Service LLC Employee Benefit Plan Civil Action Number 8:02-2758-20.

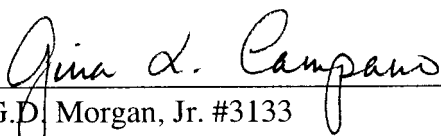
F. If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: Defendants are properly identified.

G. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: Pending further investigation and consideration, Defendants reserve the right to commence cross-claims and/or third party complaints against parties liable to them.

MCANGUS, GOUDELOCK & COURIE, LLC


G.D. Morgan, Jr. #3133
Gina L. Campano #6755
700 Gervais Street, Suite 300
Post Office Box 12519, Capitol Station
Columbia, South Carolina 29211-2519
(803) 779-2300

ATTORNEYS FOR DEFENDANTS
B. SCOTT GLIDEWELL and MID-SOUTH
BENEFITS GROUP

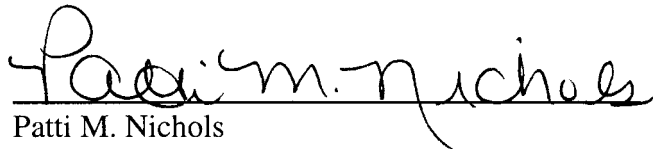
January 5, 2004

C/A No: 8:02-3397-26

CERTIFICATE OF SERVICE

I hereby certify that I have this 5th day of January, 2004 served a copy of the foregoing **Answer to Plaintiffs' Amended Complaint and Answers to Rule 26.01 Interrogatories**, on behalf of Defendants B. Scott Glidewell and Mid-South Benefits Group, by mailing a copy of same, postage prepaid, in the United States mail, with sufficient postage affixed as follows:

Robert E. Hoskins, Esquire
Foster Law Firm, LLP
601 East McBee Avenue, Suite 104
P.O. Box 2123 (29602)
Greenville, SC 29601
Attorneys for Plaintiffs


Patti M. Nichols
Legal Secretary to Gina L. Campano